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U.S. DISTRICT COURT
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201-656-6525
Attorney for Defendant William Kane

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC.,

Action No. CV97-3496(WGB)

Plaintiff,

CRISTO PROPERTY MANAGEMENT,
LTD., a/k/a/ G.J.L. LIMITED, DEK HOME OF
NEW JERSEY, INC., OAKWOOD
PROPERTIES INC., NATIONAL HOME
FUNDING, INC., CAPITAL ASSETS
PROPERTY MANAGEMENT & INVESTMENT
CO., INC., CAPITAL ASSETS
PROPERTY MANAGEMENT, L.L.C.,
WILLIAM J. KANE

**CERTIFICATION OF
JOSEPH V. SORRENTINO, ESQ.
IN SUPPORT OF LEAVE TO
WITHDRAW**

Defendants:

I, JOSEPH V. SORRENTINO, hereby certify to the Court as follows:

I. I am an attorney-at-law of the States of New Jersey and New York and was counsel for defendant William Kane in United States v. Kane, et al., Criminal No. 01-047 (AMW) ("the criminal case"), as well as in Walsh Securities, Inc. v. Cristo Property Management, Ltd., et al., Civil Action No. 97-3496 (WGB) ("the civil case"). I hereby respectfully submit this certification in support of my motion to withdraw from representing CRISTO PROPERTY MANAGEMENT, LTD., a/k/a G.J.L. LIMITED,

DEK HOMES OF NEW JERSEY, INC., OAKWOOD PROPERTIES INC., NATIONAL HOME FUNDING, INC., CAPITAL ASSETS PROPERTY MANAGEMENT & INVESTMENT CO., INC., CAPITAL ASSETS PROPERTY MANAGEMENT, L.L.C., and WILLIAM KANE, in the above-captioned matter, *i.e.*, the civil case.

I began representing Mr. Kane in the criminal case on or about September, 1997. At that time I agreed to appear for Mr. Kane's business entities in this action as a courtesy to prevent a default judgment. At the time it was Mr. Kane's intention to retain civil counsel which he eventually did. Ronald Kleinberg Esq. drafted the answer to the within lawsuit and appeared under the auspices of my notice of appearance since Mr. Kleinberg was not admitted to practice law in this court. Thereafter, Mr. Kleinberg had interposed an answer and Judge Bassler stayed all proceedings until the conclusion of the criminal case. I have spoken to Mr. Kane's wife, Yvonne Kane, and she has informed me that Mr. Kane never intended for me to represent him in this matter as he knows my area of practice is in criminal defense. Furthermore, he has no interest in expending any resources in defending any of the named corporate entities and is not concerned about the plaintiff obtaining a judgment against any of them. I have endeavored to include in this motion information as accurately as possible. However, the original criminal file is in storage and I was unable to retrieve it. In addition I have attempted to speak to Michael Washor Esq. who acted as co-counsel on Mr. Kane's criminal matter but have not been able to do so. I have also notified Mr. Kleinberg by telephone of my intention to withdraw as counsel herein.

2. To the extent that is necessary, I hereby move to withdraw from my prior representation of Mr. Kane, pursuant to L.Civ.R. 102.1. Pursuant to RPC 1.16, as made applicable by L.Civ.R. 103.1, such withdrawal is appropriate because

(a) the withdrawal can be accomplished without material adverse impact upon the client, RPC 1.16(b)(1), as Mr. Kane is presently incarcerated, consents to this withdrawal, and has informed me that the entities named as defendant's herein are now defunct, not operating on daily basis and have no appreciable assets.

(b) Mr. Kane has indicated that he can no longer pay for my services PRC 1.16(b)(6) ("...the representation will result in an unreasonable financial burden on the lawyer ..."); and

(c) Mr. Kane has confirmed that he no longer desires my representation, as a result of which "other good cause for withdrawal exists." RPC 1.16(b) (7).

3. I have spoken to Mr. Kane's wife, Yvonne Kane, and she has advised me that Mr. Kane consents to this application.

4. For these reasons, I respectfully request that the within motion be granted.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 27, 2005


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